IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

MARIA MARQUEZ,	§	
Plaintiff,	§ 8	
1 tuttiy,	8	
V.	§	Civil Action No. 3:21-cv-01847-C
	§	
ELDORADO CW INVESTMENTS, LTD.	§	
d/b/a THE CAR WASH ZONE, and ECWI,	§	
LLC,	§	
	§	
Defendants.	§	

AGREED MOTION TO EXTEND PRETRIAL DEADLINES

Defendants Eldorado CW Investments, LTD. d/b/a The Car Wash Zone and ECWI, LLC and Plaintiff Maria Marquez (together, the "Parties"), file this agreed motion to extend pretrial deadlines and state:

- 1. On September 8, 2021, the Court issued a Scheduling Order [Dkt. 7], setting the case for trial at 9:00 a.m. on February 6, 2023.
- 2. On January 4, 2023, the Parties received a notice from United States Courts that "the United States District Court for the Northern District of Texas will implement a mandatory upgrade to the Next Generation of CM/ECF (NextGen)." The Parties were notified that the Northern District of Texas's electronic court filing system will be unavailable from January 13, 2023 at 5:00 p.m. through January 17, 2023 at 7:00 a.m. to perform this upgrade ("Scheduled Outage").
- 3. The Parties' various pretrial deadlines are January 16, 2023, during the Scheduled Outage.
 - 4. The Parties request an extension of all applicable deadlines within the Scheduling

Order that fall within the scheduled outage to January 17, 2023 at 3:00 p.m. This extension will not result in the extension or continuance of any other deadlines in this case.

- 5. The Parties have conferred and agreed to extend the pretrial deadlines.
- 6. In view of the foregoing, the Parties respectfully request that the Court extend all deadlines in its Scheduling Order that fall within the Scheduled Outage to January 17, 2023 at 3:00 p.m.

Dated: January 6, 2023 Respectfully submitted,

By: /s/ Amy E. Gibson
Amy E. Gibson
Texas Bar No. 00793801
amy@gwfirm.com
David L. Wiley
Texas Bar No. 24029901
david@gwfirm.com

GIBSON WILEY PLLC

1500 Jackson Street, #109 Dallas, Texas 75201-4923 (214) 522-2121 (214) 522-2126 (fax)

Christopher Willett
Texas Bar No. 24061895
cwillett@equaljusticecenter.org
Caitlin Boehne
Texas Bar No. 24075815
cboehne@equaljusticecenter.org

EQUAL JUSTICE CENTER

314 East Highland Mall Boulevard Suite 401 Austin, Texas 78752 (512) 474-0007 (512) 474-0008 (fax)

ATTORNEYS FOR PLAINTIFF

By: <u>/s/ John H. Yoon</u>

Ryan M. McComber Texas Bar No. 24041428 ryan.mccomber@figdav.com

John H. Yoon

Texas Bar No. 24125958 john.yoon@figdav.com

FIGARI + DAVENPORT, LLP

901 Main Street, Suite 3400 Dallas, Texas 75202 (214) 939-2000 (214) 939-2090 – fax

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2023, I served the foregoing on Plaintiff, through her counsel of record, *via email* pursuant to the Court's scheduling order as follows:

Ms. Amy E. Gibson amy@gwfirm.com
Mr. David L. Wiley david@gwfirm.com
Gibson Wiley PLLC
1500 Jackson Street #109
Dallas, Texas 75201-4923

Mr. Christopher Willett cwillett@equaljusticecenter.org
Ms. Caitlin Boehne cboehne@equaljusticecenter.org
Equal Justice Center
314 East Highland Mall Boulevard
Suite 401
Austin, Texas 78752

ATTORNEYS FOR PLAINTIFF

/s/ John H. Yoon	
John H. Yoon	